

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:)
)
Redevelopment of Spectrum to)
Encourage Innovation in the Use)
of Telecommunications Technologies)

ET Docket No. 92-9 ✓

ORIGINAL
FILE

REPLY COMMENTS
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association (USTA) respectfully submits its reply to comments filed June 5, 1992 in the above-referenced docket.

The comments received by the Commission underscore the widespread interest in spectrum reallocation. As will be discussed below, the Commission must balance the interests of current telecommunications service providers utilizing the 2 GHz band with those providers seeking spectrum to offer new telecommunications services, such as personal communications services (PCS). However, one issue upon which the majority of commenters agree is that the Commission must obtain access to adjacent Federal government frequencies in order to accommodate growth in the demand for spectrum. Access to government spectrum in the 1710 to 1850 MHz band would increase the amount of spectrum available for either current or emerging radio-based services.¹

¹ The National Telecommunications and Information Administration (NTIA) released a Notice of Inquiry regarding future requirements for the use of radio

Other issues were discussed in the comments regarding licensing, eligibility and standards for the provision of PCS. These issues can be deferred to CC Docket No. 90-314, as they do not relate specifically to the proposed reallocation of spectrum in the 2 GHz band.

USTA's reply comments focus on three areas: network reliability, the proposed transition period and channelization.

1. Network Reliability

As USTA observed in its comments, the Commission should not assume that non-radio alternatives to microwave are always available, due to economic, technical and environmental considerations. However, some commenters complained that a fiber-based system would not be a reasonable alternative to a microwave system because the fiber system would not be as reliable.² Some, for example, cited examples of outages of public telecommunications networks caused by fiber cuts. USTA

frequency spectrum in the U.S. and technology trends that would impact use of the radio spectrum. 57 Fed. Reg. 25010. The record developed by the NTIA, as well as in this docket and in CC Docket No. 90-314, may facilitate the identification of spectrum currently assigned to the government for use by emerging technologies or to relocate current users in the 2 GHz band.

² Comments of Utilities Telecommunications Council at pp.55-57, Bluegrass Cellular at p.2, Cellular Telecommunications Industry Association at p.6, Edison Electric Institute at p.15, Association of American Railroads at p.39, American Gas Association at p.5, Alcatel at p.24, OCOM Corporation at p.9 and Large Public Power Council at p.39.

believes that the record should reflect that telephone networks are highly reliable and will continue to be in order to meet the demands of customers and the standards imposed by Federal and state regulatory bodies.

The reliability inherent in the public telephone network can be further enhanced by diverse routing capabilities and special service offerings. For example, fiber ring architecture is currently being deployed in many urban areas, where PCS will develop initially, which can detect any problem and provide instantaneous backup to ensure uninterrupted transmission.³ Utility companies rely on telephone company-provided circuits with satisfactory results. Likewise, rural areas also support diverse routing schemes through the public telephone network. Service offerings are available which utilize a variety of different media, including both radio and land line facilities. Such offerings enhance reliability through protection switching systems designed to provide diversity.

The ability to exercise control over the transmission path is an advantage of owning and operating a private point-to-point microwave facility. Local exchange carriers are deploying products and services which will facilitate customer control of their networks and which will enable them to maintain a reliable system.

³ Comments of U S West at p.8.

2. Transition Period.

In order to encourage the relocation of point-to-point microwave providers from the 2 GHz band, the Commission proposed a ten to fifteen year transition period after which current users, with certain exceptions, would become secondary. While potential new service providers supported the Commission proposal, current users objected.

The imposition of a specific time period after which incumbent users automatically would become secondary may be arbitrary, particularly in areas where new service providers will not seek spectrum or in cases where there is no alternative to 2 GHz facilities. To balance the competing interests of new service providers and incumbent users, the Commission should consider allowing market demand to be a determining factor in whether an incumbent can relocate. For example, it is likely that the demand for spectrum in urban areas will be greater than in rural areas for some new services. Thus, there may be no need for the Commission to clear the entire 2 GHz band at a predetermined time. If there is no demand for a particular frequency, or if there is no alternative facility available to relocate the incumbent, there appears to be no justification for requiring the incumbent to accept secondary status after ten or fifteen years. Any current user in the 2 GHz band should be able to retain primary status until relocated to a comparable replacement facility which is in place and tested. Further, as USTA noted in its comments, any relocated user must be fully

compensated for all of the costs of relocation.

However, the incumbent should be expected to relocate in cases where the market demand exists and the emerging service licensee can identify an adequate alternative facility, develop an appropriate transition mechanism and provide the necessary cost commitment.⁴

3. Channelization.

Uncontrolled relocation of narrowband systems to the upper bands will not ensure the optimal use of the spectrum to be made available by this proceeding.⁵ Development of channelization plans for the upper bands would be helpful to avoid the inefficient utilization of spectrum. The establishment of an industry-wide forum to development of channelization plans and the establishment of a priority of channel usage in the upper bands should be encouraged by the Commission. Any plans should specify that narrowband channels should be exhausted before wideband channels are utilized for narrowband stacking. This will preserve wideband integrity and promote spectrum efficiency. In addition, channelization plans should include a single set of rules for private and common carrier coordination in the upper bands. Both private and common carrier licensees would benefit

⁴ See, comments of Pacific Telesis at p.15-16, 17-18.

⁵ Comments of National Spectrum Managers Association at pp.2-3 and MCI at p.2.

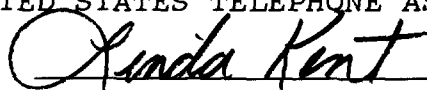
by the development of Part 21 frequency coordination rules.⁶

In conclusion, alternatives to microwave, such as fiber, will not impair the delivery of reliable service. Channelization plans will enhance spectrum efficiency in the upper bands. The Commission may be able to balance the competing interests for spectrum as described herein. There appears to be general agreement that adjacent government spectrum would provide the Commission with greater opportunities to accommodate those interests.

Respectfully submitted,

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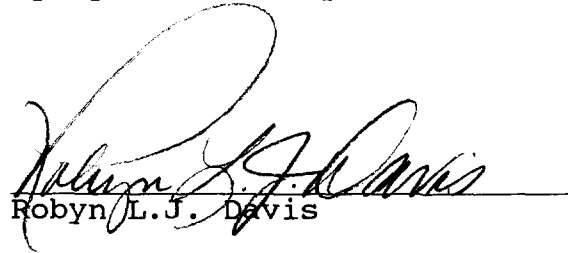
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⁶

See, Amendment of Parts 2, 21, 25 and 94 of the Commission's Rules to Accommodate Common Carrier and Private Op-Fixed Microwave Systems in Bands Above 3 GHz, RM-8004, Petition for Rulemaking, filed May 22, 1992 at p.17.

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on July 6, 1992
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